

Statement of Consistency with Draft South Dublin County Development Plan 2022-2028

In respect of

Proposed Residential Development at The ABB Site, Belgard Road, Tallaght, Dublin 24

Prepared for

Landmarque Belgard Development Company Ltd.

Prepared by

John Spain Associates

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39 Fitzwilliam Place, Dublin 2
Telephone: (01) 662 5803
E-mail info@johnspainassociates.com

1.0 INTRODUCTION

- 1.1 On behalf of the applicant, Landmarque Belgard Development Company Limited, this Statement of Consistency with Planning Policy has been prepared to accompany an application for a proposed strategic housing development at the ABB site, Belgard Road, Tallaght, Dublin 24 on a site of c. 0.898 hectares. The development is proposed to be called The Arboury.
- 1.2 In summary, the proposal will comprise a residential development of 334 no. units (216 residential units which includes 3 no. live-work units and 118 Build-to-Rent residential units), new tertiary route to the south, public open space, communal open space and landscaping, car parking access, residential amenity spaces, drainage infrastructure and parking on a brownfield site. A crèche and 4 no. commercial units are also proposed.
- 1.3 **This Statement of Consistency addressed the Draft South Dublin County Development Plan 2022-2028. It is noted at time of submission the Material Alterations have been published. This Statement is provided in the scenario where a decision is made post the new Development Plan being in effect. The final content of the 2022-2028 CDP is not known at the time of submission.**
- 1.4 **A separate Planning Report and Statement of Consistency with the 2016 CDP and Tallaght LAP 2020 is also submitted.**

2.0 STATEMENT OF CONSTENCY WITH SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

	Response
2.0 Core Strategy and Settlement Strategy	
Policy CS6: Settlement Strategy - Strategic Planning Principles	<p>The proposed development will assist in delivering on national and regional objectives to deliver at least 50% of all new homes within the built up area of Dublin City and Suburbs which includes Tallaght. The site is brownfield in nature and its redevelopment will deliver on compact urban form objectives. The proposed density of 372 uph is an efficient use of land as a resource.</p>
Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.	
CS6 Objective 1: To implement the Growth Strategy detailed in the RSES and in particular, the delivery of sustainable growth in the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (consistent with RPO 3.1)	
CS6 Objective 2: To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).	
CS6 Objective 3: To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).	
CS6 Objective 4: To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and/or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.	
CS6 Objective 5: To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which need them.	

<p>CS6 Objective 6: To support, through the compact growth model in the Core Strategy and settlement strategy and by ensuring population growth and plot densities are sustainable, the just transition to a climate resilient, biodiversity-rich, environmentally sustainable and carbon neutral economy before 2050.</p>	
<p>Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement</p>	<p>The proposed development will deliver a more intensive population use within a key urban centre, Tallaght.</p>
<p>Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.</p>	<p>The site is a brownfield site, zoned town centre with the objective to deliver a mix of uses as is proposed</p>
<p>CS7 Objective 1: To promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.</p>	
<p>CS7 Objective 3: To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).</p>	
<p>3.0 Natural, Cultural and Built Heritage</p>	
<p>3.2 Heritage and Climate Action</p>	
<p>Policy NCBH2: Biodiversity</p>	<p>A Natura Impact Statement and Ecological Impact Assessment prepared by Altemar are submitted with the application, which contain mitigation measures for the prevention of significant effects on the environment including Natura 2000 sites.</p>
<p>Protect, conserve, and enhance the County’s biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.</p>	
<p>NCBH2 Objective 2: To ensure the protection of designated sites in compliance with relevant EU Directives and applicable national legislation.</p>	<p>Measures to improve biodiversity on site are contained in the landscaping proposals.</p>
<p>NCBH2 Objective 3: To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as ‘stepping stones’ for the purposes of green infrastructure and Article 10 of the Habitats Directive.</p>	

<p>NCBH2 Objective 4: To protect our rivers and in particular to avoid overdevelopment which could have an adverse effect on the biodiversity and ecosystems of the river.</p>	
<p>Policy NCBH3: Natura 2000 Sites</p>	<p>A Natura Impact Statement prepared by Altemar is submitted with the application, which contains mitigation measures for the prevention of significant adverse effects on Natura 2000 sites.</p>
<p>Conserve and protect Natura 2000 Sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.</p>	
<p>NCBH3 Objective 1: To prevent development and activities that would adversely affect the integrity of any Natura 2000 site located within or adjacent to the County and promote the favourable conservation status of the habitats and species integral to these sites.</p>	
<p>NCBH3 Objective 2: To ensure that plans, including land use plans, will only be adopted, if they either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a plan is likely or might have such a significant effect (either alone or in combination), South Dublin County Council will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the plan will not adversely affect the integrity of any European site, will South Dublin County Council adopt the plan, incorporating any necessary mitigation measures. A plan which could adversely affect the integrity of a European site may only be adopted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.</p>	
<p>To ensure that plans, including land use plans, will only be adopted, if they either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a plan is likely or might have such a significant adverse effect (either alone or in combination), South Dublin County Council will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the plan will not adversely affect the integrity of any European site, will South Dublin County Council adopt the plan, incorporating any necessary mitigation measures. A plan which could adversely affect the integrity of a European site may only be adopted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation</p>	

<p>NCBH3 Objective 3: To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.</p>	
<p>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas</p>	<p>An Ecological Impact Assessment prepared by Altemar is submitted with the application, which proposes mitigations based on site surveys.</p>
<p>Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.</p>	<p>Measures to improve biodiversity on site are contained in the landscaping proposals.</p>
<p>NCBH5 Objective 1: To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.</p>	
<p>NCBH5 Objective 2: To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.</p>	
<p>Policy NCBH10: Invasive Species</p>	<p>An Ecological Impact Assessment prepared by Altemar is submitted with the application, which notes no invasive species were found on site during surveys.</p>
<p>Protect against and prevent the introduction and spread of invasive species within the County and require landowners and developers to adhere to best practice guidance in relation to the control of invasive species.</p>	
<p>NCBH10 Objective 1: To ensure that development proposals do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are</p>	

<p>or were previously present, applicants should submit a control and management programme with measures to prevent, control and/or eradicate the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).</p>	
<p>Policy NCBH13: Archaeological Heritage</p>	<p>An Archaeological Impact Assessment has been prepared by IAC:</p>
<p>Manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.</p>	<p><i>Given the level of development that has taken place within the proposed development area, it is probable that any archaeological remains that may have been present within the site have since been removed. As such, no adverse impacts on the archaeological resource are predicted as a result of the development going ahead.</i></p>
<p>NCBH13 Objective 1: To favour the preservation in-situ of all sites, monuments and features of significant historical or archaeological interest in accordance with the recommendations of the Framework and Principles for the Protection of Archaeological Heritage, DAHGI (1999), or any superseding national policy document.</p>	<p><i>The proposed development will not have any negative impact on natural, built and cultural heritage features in the area.</i></p>
<p>NCB13 Objective 2: To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown sites, features and objects.</p>	
<p>Policy NCBH15: Views and Prospects</p>	<p>The LVIA highlights the current character of the site which is commercial / industrial in nature. The width of the road infrastructure is a key characteristic of the site's immediate environs and the wider urban area. It reflects the area's former use as an industrial zone, and presents both an opportunity and a challenge in emerging character of the area. The LVIA notes the presence of the Tallaght ACA, upon which there is limited potential for the proposed development to affect. The nearest part of the ACA to the site is St Maelruain's Church and graveyard, which is some 200m from the site and separated from it by Belgard Road and a portion of the university campus.</p>
<p>Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.</p>	
<p>NCBH15 Objective 1: To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places and to prevent development which would impede or interfere with Views and / or Prospects.</p>	
<p>NCBH15 Objective 2: To require a Landscape/Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.</p>	<p>The TVIA notes a medium sensitivity of the surrounding Belgard Road area and considers that while due to its pivotal position in the urban structure, the site's redevelopment has the potential to change the character of an important part of the townscape, the significance of impacts from the development is predicted to be <i>moderate and positive</i>.</p>

	The TVIA concludes that <i>‘In all cases the visual effects are predicted to be positive’</i> and that <i>‘the proposed development can be considered an appropriate intervention in the evolving townscape of Tallaght town centre’</i> .
4.0 Green Infrastructure	
4.1 Methodology	
Policy GI4: Sustainable Urban Drainage Systems	
Require the provision of Sustainable Urban Drainage Systems (SUDS) in the County and maximise the amenity and biodiversity value of these systems.	The proposed development incorporates green infrastructure throughout the development where possible including: the utilisation of SUDS, landscaped courtyards, public realm and roof gardens.
GI4 Objective 1: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SuDS) using surface water and nature based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council’s Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.	Proposals to encourage biodiversity are contained within the landscape proposals.
GI4 Objective 3: To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.	
Policy GI5: Climate Resilience	
Strengthen the County’s GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.	Green roofs are provided in the scheme.
GI5 Objective 7: Require the provision of green roofs and green walls, providing benefits for biodiversity and as an integrated part of Sustainable Drainage Systems (SuDS) and Green Infrastructure, in apartment, commercial, leisure and educational buildings, wherever possible and develop an evidence base for specific green roof requirements as part of the Council’s ongoing SuDs strategy development.	

<p>Policy GI6: Human Health and Wellbeing</p>	<p>The proposal provides for a mix of public, communal and private open spaces, which facilitate multi use activities.</p> <p>The scheme includes a new public route along the southern boundary, improving permeability for the wider area as part of the scheme.</p>
<p>Improve the accessibility and recreational amenity of the County’s GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.</p>	
<p>GI6 Objective 4: To ensure that all new residential development provides access to multifunctional green open space, in accordance with the provisions of Chapter 8 Community and Public Open Space of this Development Plan and South Dublin County’s Parks and Open Space Strategy.</p>	
<p>GI6 Objective 5: To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.</p>	
<p>5.0 Quality Design and Healthy Placemaking</p>	
<p><i>5.2 Successful and Sustainable Neighbourhoods</i></p>	
<p>Policy QDP1: Successful and Sustainable Neighbourhoods</p>	<p>Compliance with the Section 28 Guidelines referenced has been set out in the separate Planning Report and Statement of Consistency with the 2016 Development Plan.</p> <p>The proposal provides a mix of uses, contributing to activity throughout the day.</p>
<p>Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities.</p>	
<p>QDP1 Objective 1: To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).</p>	
<p>QDP1 Objective 2: To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated).</p>	
<p>QDP1 Objective 3: To protect the quality, ambiance, vibrancy and vitality of urban centres by promoting an appropriate mix of complementary and compatible day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses.</p>	

<p>QDP1 Objective 4: To reinforce the network of urban centres as the appropriate locations for new mixed-use development, ensuring that the existing context including identified built and natural assets, urban design, integration and potential for connectivity fully informs development.</p>	
<p>Policy QDP6: Public Realm</p>	<p>The high quality public realm proposals are set out in the Landscape Design Report and associated drawings prepared by Cameo & Partners.</p>
<p>Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.</p>	
<p>QDP6 Objective 1: To require that all development proposals, whether in established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm. To demonstrate how the highest quality in public realm design is achieved and how it can be robustly maintained over time (see also Chapter 13 Implementation and Monitoring - Design Statements and Public Realm).</p>	<p>The scheme provides for 17% public open space, in excess of the 10% requirement of the LAP.</p>
<p>QDP6 Objective 6: To ensure that all new developments but particularly apartment developments where gardens do not form part of the home, make provision for sufficient public realm space to enable the community to enjoy a healthy living environment outdoors but within the boundaries of the development and that no new development whether it be private or social creates a development that downgrades the public realm to an extent that it is insufficient to serve as a healthy place to live, both mentally and physically.</p>	
<p>Policy QDP8: High Quality Design – Building Height and Density Guide (BHDG)</p>	<p>A response to the UDBHG is contained in the separate Planning Report and Statement of Consistency.</p>
<p>Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin County’s Building Heights and Density Guide 2021.</p>	<p>The information set out in Appendix 10 of the draft Development Plan is contained within the Architectural Design Statement.</p>
<p>QDP8 Objective 1: To assess development proposals in accordance with the Building Height and Density Guide set out in Appendix 10 of this Development Plan and associated planning guidelines. In this regard, all medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a ‘Design Statement’. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County’s Height and Density Guide.</p>	<p>The proposal, it is submitted, is compliant with the UDBHG; however the draft Development Plan also refers to compliance with the provisions of LAPs in terms of height, with which the development is not compliant. Please refer to the material contravention statement for further detail.</p>

<p>Any departures within the proposed development from the guidance set out in the Building Height and Density Guide for South Dublin County (Appendix 10) shall be clearly highlighted in the Design Statement. (See Chapter 13 Implementation and Monitoring).</p>	
<p>Policy QDP9: High Quality Design - Building Height and Density</p>	<p>The justification for the proposed taller element of the scheme to the north eastern corner of the scheme is set out in the Architectural Design Statement and Townscape and Visual Impact Assessment.</p>
<p>Apply a context driven approach to building heights in South Dublin, as supported by South Dublin’s Building Heights and Density Guide.</p>	
<p>QDP9 Objective 1: To require that designers and applicants demonstrate to the satisfaction of the Planning Authority that applications for landmark type buildings or for amplified heights akin to a landmark, are contextually appropriate and that the proportionate function of the landmark justifies it, having regard to the primary, secondary and local landmark classifications.</p>	
<p>Policy QDP10: Mix of Dwelling Types</p>	<p>The proposal provides for a wide range of unit types, with duplexes, apartments and live-work units.</p>
<p>Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</p>	<p>The scheme however is not compliant with the Housing Strategy as 30% of units are not 3 bedroom units.</p>
<p>QDP10 Objective 1: To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</p> <p>Proposed change as part of Material Amendments: To ensure that all new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</p>	<p>A justification is set out in the material contravention statement.</p>

6.0 Housing	
<i>6.7 Quality of Residential Development</i>	
<i>6.7.1 Residential Design and Layout</i>	
Policy H7: Residential Design and Layout	Compliance with the Section 28 Guidelines has been set out.
Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.	A sustainability statement is contained within the application documents. The proposal has been designed to connect to district heating.
H7 Objective 1: To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) and Chapter 13 Implementation and Monitoring.	A new east west route along the south of the site is provided for pedestrians and cyclists
H7 Objective 2: To ensure that new residential developments incorporate energy efficiency measures and promote innovation in renewable energy opportunities.	
H7 Objective 3: To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour, and only progressing vehicle permeability schemes where necessary.	
Proposed change as part of Material Amendments: H7 Objective 3: To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour, and only progressing vehicle permeability schemes where necessary, having regard to the National Transport Authority’s Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.	

<p>H7 Objective 4: To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).</p>	
<p>Policy H8: Public Open Space</p>	<p>All public, communal and private open spaces within the scheme benefit from passive surveillance, with clear definition between the different categories of spaces.</p>
<p>Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.</p>	<p>The quantum of public open space is not in compliance with the draft Development Plan which seeks a 2.4ha provision per 1000 population. Please refer to the material contraventions statement for further details.</p>
<p>H8 Objective 1: To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Public Open Space and Chapter 13: Implementation and Monitoring.</p>	
<p>H8 Objective 2: To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.</p>	
<p>Policy H9: Private and Semi-Private Open Space</p>	<p>The private and communal open spaces meet the requirements of the Apartment Guidelines and Chapter 13.</p>
<p>Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.</p>	<p>Details of the communal open spaces are contained with the landscape Report and drawings prepared by Cameo + Partners</p>
<p>H9 Objective 1: To ensure that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 13 Implementation and Monitoring.</p>	
<p>H9 Objective 2: To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.</p>	

<p>Policy H11: Privacy and Security</p>	<p>Clearly defined private, communal and public open spaces are provided and designed to maintain privacy and security.</p>
<p>Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.</p>	<p>The development provides frontages on all elevations, enabling passive surveillance.</p>
<p>H11 Objective 1: To ensure there is a clear definition and delineation between private, semiprivate (communal) and the public open spaces that serve residential development.</p>	<p>Defensible spaces are provided for street/podium level units as set out in the Landscape Design Report.</p>
<p>H11 Objective 2: To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.</p>	
<p>H11 Objective 3: To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.</p>	
<p>Proposed change as part of Material Amendments: H11 Objective 3: To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security, where it consists of gardens, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. In limited circumstances, some discretion may be provided for where the configuration of the space can provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.</p>	
<p>H11 Objective 4: To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.</p>	
<p>Policy H13: Residential Consolidation</p>	<p>A comprehensive sunlight and daylight assessment is submitted with the application.</p>
<p>Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.</p>	
<p>H13 Objective 5: To ensure that new development in established areas does not unduly impact on the amenities or character of an area.</p>	

8.0 Community Infrastructure and Open Space											
<p><i>8.7.3 Quantity of Public Open Space</i></p> <p>South Dublin County has a wide variety of public open space distributed throughout the County. The aggregate area of public open space in the County is over 1500 hectares with the spaces varying greatly in size and landscape character. In addition, the residents of South Dublin County also have access to extensive areas of smaller residential open spaces which have a more informal amenity function, contribute to green corridors and enhance the overall visual amenity of an area.</p> <p>The overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element. Within that standard, there are specified percentages as set out in Table 8.2 which must, as a minimum, be provided on site. Only in exceptional defined circumstances, as set out in the objectives below, will flexibility be provided for.</p>	<p>Please refer to the material contravention statement which sets out a justification for non compliance with the quantitative provisions on public open space.</p> <p>The proposals provides for 17% public open space; which is in excess of the 10% sought in the LAP.</p> <p>Details on the quality of the public open space is contained in the landscape report and drawings</p>										
<p>Table 8.2: Public Open Space Standards</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #D9EAD3;">Land Use</th> <th style="background-color: #D9EAD3;">Public Open Space Standards (minimum)</th> </tr> </thead> <tbody> <tr> <td>Overall Standard</td> <td>2.4 Ha per 1,000 Population</td> </tr> <tr> <td>New Residential Development on Lands Zone RES-N</td> <td>Minimum 15% of site area</td> </tr> <tr> <td>New Residential Development on Lands in Other Zones including mixed use</td> <td>Minimum 10% of site area</td> </tr> <tr> <td>Institutional Lands / 'Windfall' Sites</td> <td>Minimum 20% of site area</td> </tr> </tbody> </table>		Land Use	Public Open Space Standards (minimum)	Overall Standard	2.4 Ha per 1,000 Population	New Residential Development on Lands Zone RES-N	Minimum 15% of site area	New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area	Institutional Lands / 'Windfall' Sites	Minimum 20% of site area
Land Use	Public Open Space Standards (minimum)										
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New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area										
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area										

<p>COS5 Objective 13: To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability.</p>	
<p>COS5 Objective 16: To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing the following measures:</p> <ul style="list-style-type: none">→ Providing active frontages and maximising passive surveillance from adjacent housing and/or public thoroughfares;→ Eliminating buildings which back-on or gable-front public open spaces;→ Designing corner units with active frontage;→ Encouraging increased use through improved access and quality of facilities'; and→ Careful location, design and choice of surface materials and site furniture.	
<p>COS5 Objective 17: To ensure that incidental areas of open space which do not function as useable open space and/or are not clearly visible from the public realm, are designed out of a proposed scheme.</p>	
<p>COS5 Objective 19: To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of differing age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure playspaces and play facilities comply with universal design principles.</p>	
<p>COS5 Objective 20: To ensure that children’s play areas are provided as an integral part of the design and delivery of new residential and mixed-use developments and addressed as part of a landscape plan in accordance with the requirements set out in Chapter 13: Implementation and Monitoring.</p>	

8.9 Early Childhood Care and Education Facilities	
Policy COS7: Childcare Facilities	Compliance with the 2001 Guidelines has been set out for the childcare facility proposed as part of the scheme.
Support and facilitate the provision of good quality and accessible childcare facilities at suitable locations within the County in consultation with the County Childcare Committee.	
COS7 Objective 2: To require provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the Childcare Facilities Guidelines for Planning Authorities (2001) or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variation to this standard being justified having regard to factors such as type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity.	
8.11 Higher Level Education and Further Education Facilities	The proposal will specifically deliver on COS9 Objective 6, providing a new public through route along the south of the site, which will improve permeability between TUD and the town centre and wider area
Policy COS9: Higher Level Education and Further Education Facilities	
Support the development and ongoing provision of higher-level education and further education in the County, and develop Tallaght as a hub for education, cross collaboration and employment to provide further opportunities for the County’s workforce.	
COS9 Objective 6: To facilitate increased permeability between TU Dublin Tallaght Campus and the surrounding employment, residential and mixed-use areas.	
9.0 Economic Development and Employment	
10.2 Energy Measures	
Policy E3: Energy Performance In Existing and New Buildings	
Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.	The proposal is designed to meet all of the relevant building regulations, contributing to achieving National and South Dublin Climate Change Action Plans. Please see the Energy Statement

<p>E3 Objective 1: To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings and other buildings through the design and location of new development, in accordance with relevant building regulations and national policy and guidance.</p>	<p>included with the submission prepared by Metec Consulting Engineers.</p>
<p>E3 Objective 2: To prioritise the retrofitting of buildings over demolition and reconstruction where possible to reduce the large quantities of embodied carbon energy generated from building materials when building from the ground up.</p>	<p>The existing commercial building is proposed to be demolished to provide for a more efficient use of land. The existing building does not achieve in any meaningful manner, the Town Centre zoning objective for the site, as would be delivered by the proposed development.</p>
<p>E3 Objective 3: To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.</p>	
<p>E2 Objective 4: To support and facilitate the actions and targets of the National and South Dublin Climate Action Plans where they relate to private and public buildings in the County.</p>	
<p>Policy E5: Low Carbon District Heating Networks</p>	
<ol style="list-style-type: none"> 1. Support the delivery of low carbon district heating networks at appropriate locations across the County and subject to proven feasibility. Support also complementary technologies such as combined cooling, heat and power (CCHP), large scale heat pumps, and renewable energy opportunities, including geothermal energy, energy from waste, biomass and bio-gas. 2. Support the investigation of both deep and shallow geothermal energy sources throughout the County. Deep geothermal projects are particularly suited to areas demonstrating high heat densities. 3. Support the delivery of District Heating Proposals subject to proven feasibility within areas demonstrating heat demand density in excess of 150TJ/km² (including for the identified areas of Low Carbon District Heating Potential in Tallaght, Clonburris/Grange Castle and Clondalkin). Future developments within these areas should connect into existing or confirmed District Heating Systems. Where a District Heating scheme has not been confirmed new development should be designed so that it can connect into such a scheme when one is delivered. 	<p>The proposal has been designed to connect to the local District Heating system should it be completed. The scheme has also been designed so as not to rely on the District heating system.</p>

<p>4. Support for low carbon district heating networks is subject to the appropriate environmental assessments being undertaken to ensure no significant impact on the wider environment including human health.</p>	
<p>E5 Objective 1: To future proof the built environment in Low Carbon District Heating Areas of Potential to enable the delivery of local energy networks and a move towards de-centralised energy systems</p>	
<p>11.0 Infrastructure and Environmental Services</p>	
<p>Policy IE2: Water Supply and Wastewater</p>	<p>A confirmation of feasibility and Statement of Design Acceptance has been received for the development from Irish Water.</p>
<p>Ensure that water supply and wastewater infrastructure is sufficient to meet the growing needs of the population and to support growth in jobs over the lifetime of the Development Plan facilitating environmental protection and sustainable growth.</p>	<p>The proposed foul infrastructure is proposed to connect to the public sewerage system.</p>
<p>IE2 Objective 9: To ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system.</p>	<p>A separate foul and surface water drainage system are proposed.</p>
<p>IE2 Objective 10: To require all development proposals to provide a separate foul and surface water drainage system – where practicable.</p>	
<p>Policy IE4: Flood Risk</p>	<p>A Site Specific Flood Risk Assessment has been carried out by Cronin Sutton in accordance with the Flood Risk Guidelines and in accordance with the precautionary principle which confirms the development is at low risk of flooding.</p>
<p>Ensure the continued incorporation of Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.</p> <p>Proposed change as part of Material Amendments: IE4 Objective 1: To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive and Chapter 13 Implementation and Monitoring and the policies and objectives of this chapter.</p>	
<p>IE4 Objective 1: To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk</p>	

<p>Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.</p>	
<p>IE4 Objective 2: To require all developments in the County to be designed and constructed in accordance with the “Precautionary Principle” detailed in the OPW Guidelines.</p>	
<p>Policy IE8: Casement Aerodrome</p>	<p>An Aviation Safety Assessment submitted with this application has been carried out by O’Dwyer Jones which confirms that the development complies with the requirements.</p>
<p>Safeguard, having regard to the requirements of the Department of Defence, the current and future operational, safety and technical requirements of Casement Aerodrome and facilitate its ongoing development for military and ancillary uses.</p>	
<p>IE8 Objective 1: To ensure the safety of military and other air traffic, present and future, to and from Casement Aerodrome with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities.</p>	
<p>IE8 Objective 2: To maintain the airspace around Casement aerodrome free from obstacles to facilitate aircraft operations to be conducted safely, as identified in the Development Plan Index map and outlined in Chapter 13 Implementation and Monitoring.</p>	
<p>IE8 Objective 3: To implement the principles of shielding in assessing proposed development in the vicinity of Aerodromes, having regard to Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces (2015) (See Chapter 13 Implementation and Monitoring).</p>	
<p>IE8 Objective 4: To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. In general, no development shall be permitted in the public safety zone. (See also Chapter 13 Implementation and Monitoring).</p>	
<p>Proposed change as part of Material Amendments: To prohibit and restrict development in the environs of Casement Aerodrome, where it may cause a safety hazard. (See also Policy IE13 Public Safety Zones, and Chapter 13 Implementation and Monitoring).”</p>	
<p>Policy IE11: Helipads</p>	<p>An Aviation Safety Assessment submitted with this application has been carried out by O’Dwyer Jones which confirms that the development complies with the requirements.</p>
<p>Provide protection for hospital helipads, in particular the existing helipads at Tallaght Hospital and at Hermitage Clinic, by ensuring that a 1 in 8 slope in all directions from the edge of the helipad is</p>	

<p>kept free of any new obstacles (and under any future Approach or Departure Surface which may be designated for such helipads), and by avoiding any overhead wires or masts in their vicinity.</p>			
<p>13.0 Implementation and Monitoring</p>			
<p><i>13.1 Land-Use Zoning Objectives</i></p>			
<p>The South Dublin County Development Plan 2022-2028 assigns Zoning Objectives to all lands in the County. The Zoning Objective and corresponding Land Use Zoning Tables identify the classes of development and uses that are permitted in principle, open for consideration or not permitted within each land use zone.</p> <p>The Zoning Objectives are listed in Table 13.1. The maps that accompany this written statement identify the Zoning Objectives that apply throughout the County.</p>			<p>The proposed uses are therefore compliant with the zoning objective and is in overall compliance with the zoning objective by providing for future development in the town centre, improving the area as a whole through regeneration of a brownfield site and protecting amenities of existing and planned development.</p>
<p>Zone</p>	<p>Abbreviation</p>	<p>Objective</p>	
<p>Town Centre</p>	<p>TC</p>	<p>To protect, improve and provide for the future development of Town Centres</p>	

Table 13.5: Zoning Objective 'TC': 'To protect, improve and provide for the future development of Town Centres'

Use Classes Related to Zoning Objective	
Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car park, Childcare Facilities, Community Centre, Conference Centre, Crematorium, Cultural Use, Doctor/Dentist, Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Home Based Economic Activities, Hospital, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Open Space, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Residential, Residential Institution, Restaurant/Café, Retail Warehouse, Retirement Home, Shop-Local, Shop-Major Sales Outlet, Shop-Neighbourhood, Sports Club/Facility, Stadium, Social Club, Veterinary Surgery, Work-Live Units.
Open for Consideration	Allotments, Industry-General, Motor Sales Outlet, Outdoor Entertainment Park, Recycling Facility, Science and Technology Based Enterprise, Service Garage, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.
Not Permitted	Abattoir, Aerodrome/Airfield, Agriculture, Boarding Kennels, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Data Centre, Fuel Depot, Heavy Vehicle Park, Industry-Extractive, Industry-Special, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Wind Farm.

LCT	Summary	Sensitivity
<p>Urban</p>	<ul style="list-style-type: none"> → Includes built land and historic settlements within the larger urban areas. → Primarily composed of established nucleated villages and towns that have developed historically - many of which saw significant improvements in the 19th century in terms of streetscapes. → These are surrounded by residential development of various origins but primarily 20th century with significant recent development in the past two decades. 	
<p>Principles for Development</p> <ul style="list-style-type: none"> → Appropriate siting and boundary treatments of new residential developments. → Demonstrate through design statement /masterplan/planting plan how it relates to historic core where present. → Stronger use of hedgerows and trees as a visual screening. 		
<p>Design Statements:</p> <p>In line with the provisions of Policy QDP7 Objective 1, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall be accompanied by a Design Statement. The Design Statement should address contextual and urban design issues and clearly explain the</p>		<p>A Design Statement prepared by C+W O'Brien Architects accompanies the application, addressing the Urban Design Manual, the Urban Development and Building Height Guidelines and the Apartment Guidelines.</p>

design process, the design options considered and the rationale behind the adopted design development strategy. A Design Statement should consist of:

- A detailed analysis of the proposal and statement based on the 12 design criteria set out in the 'Urban Design Manual' (2009) and reflected in the South Dublin County Council's Building Height and Design Guide as follow:



→

Detailed design including materials and external finishes should have regard to the policy, objectives and provisions of the South Dublin County Development Plan 2022-2028. In particular the guidance, and performance-based design criteria set out in the South Dublin County Height and Density Guide must be incorporated with due regard being had to relevant Ministerial

<p>Guidelines including the ‘Urban Design Manual’ (2009); ‘Sustainable Residential Development in Urban Areas’ (2009); ‘Urban Development and Building Height – Guidelines for Planning Authorities’ (2018); and ‘Design Standards for New Apartments – Guidelines for Planning Authorities’ (2018).</p>	
<p>Materials, Colours and Textures</p> <p>In addition to the above, design statements shall address the following criteria:</p> <ul style="list-style-type: none"> → Where individual larger buildings are proposed, they should generally be of contemporary architectural design and finish (including use of colour). → The proposal should provide a richness to the detailing and high-quality materials. → A material palette should be created that is simple and clear, sympathetic to surrounding urban fabric, has a connection to its context, builds and the established sense of place, whilst also creating order between the elements. → Reflecting the material character of the surrounding neighbourhood can create a dialogue with the surrounding buildings, forging a connection. → Materiality should be considered in conjunction with facade proportions. 	
<p><i>13.4.3 Building Heights and Density</i></p>	
<p>In line with the provisions of the South Dublin Building Heights and Density Guide, development proposals for increased building heights and densities shall be accompanied by a contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development.</p> <p>Proposals are required to demonstrate to the satisfaction of the Planning Authority that the overall positive benefits of the development justify the scale of increased height being proposed.</p>	<p>A contextual analysis is undertaken as part of the TVIA which supports the height of the buildings proposed.</p> <p>Compliance with the Urban Design Manual is set out in the Architectural Design Statement.</p>

<p>In order to demonstrate the overall positive benefits and justify the scale of increased height being proposed a detailed analysis of the existing context and a demonstration that the proposed height increase is contextually appropriate will be required.</p> <p>This process of analysis shall be considered alongside the provisions set out in the 'Urban Design Manual – A Best Practice Guide' (2009) which forms a key component in the design and planning processes for higher density and larger scale development proposals.</p>	
<p><i>13.5 Residential Development</i></p>	
<p><i>13.5.2 Mix of Dwelling Types</i></p>	<p>The proposed development does not provide for 30% 3 bed units and is therefore non compliant with this policy. This is addressed in the Material Contravention Statement.</p>
<p>The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality.</p> <p>SPPR 1 of the document Sustainable Urban Housing: Guidelines for New Apartments (2020) states that residential development may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.</p>	
<p>The guidelines further note that statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</p> <p>The Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan carries out an evidence-based assessment for the County up to 2028. In recognising the need to provide more family type housing within new apartments, the quantum of extant planning permissions with one and two bedroom units, and potential impact high concentrations of mono type housing has on areas, especially in regeneration area, the Development Plan has set a benchmark for 3-bedroom units, set out below.</p>	

Unit Mix

Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:

- there are unique site constraints that would mitigate against such provision or
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.

Unit mix should also provide for:

- As part of the Housing Quality Assessment defined under Section 6 of the Sustainable Urban Housing: Design Standards for New Apartments (2020), a detailed breakdown of the quantum of proposed unit types including the split between 1-bed, 2-bed, and 3-bed plus and which is in accordance with the minimum 30% 3-bed unit,
- A statement demonstrating how the scheme has been designed for / and could be adapted in the future for older people / persons with a disability / or lifetime homes, on a site or floor plan that:
 - Are designed and located having regard to the needs of older people and/or persons with a disability.
 - Are designed having regard to the concept of lifetime adaptable and/or multi-generational homes.
- In new identified residential areas, it is appropriate that schemes include a mix of house type and where a scheme is solely houses, smaller units of less than 3-bed providing for multi-generational homes, must be provided, subject to urban design and ensuring efficient use of urban land.

Further to the above requirement, Council Part 8 or Part 10 developments or such developments by Approved Housing Bodies for residential schemes may propose a different mix having regard

<p>to their specific function to deliver on the needs of the Council Housing Department and Housing List.</p>	
<p><i>13.5.3 Unit Tenure</i></p>	
<p>The Council will support the provision of a mix of tenure types across the County in creating suitable accommodation for all and will discourage undue segregation and over proliferation of a single tenure within any local area (10-minute walk of the proposed development) in line with the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</p> <p>Further to the above requirement, Council Part 8 or Part 10 or such developments by Approved Housing Bodies for residential schemes may propose a different mix having regard to their specific function to deliver on the needs of the Council Housing Department and Housing List.</p>	<p>The proposed development provides a mix of tenure type, with the development including a BTR element.</p> <p>Additionally, live-work units are included within the scheme providing a wider variety of unit types within the scheme, supporting the mixed use town centre zoning objective.</p>
<p>Separation Distances and Block Layout</p> <p>All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.</p>	<p>22 metres separation between blocks is not achieved across the scheme. A comprehensive daylight analysis is submitted. The site is located within a town centre and therefore such separation distances are not achievable without compromising objectives for compact urban growth.</p>
<p>Section 10 of the Urban Design Manual (2009) addresses privacy and amenity. A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy. A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.</p> <ul style="list-style-type: none"> • In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. • In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development. <p>Proposed change as part of Material Amendments: Section 10 of the Urban Design Manual (2009) addresses privacy and amenity and sets out that rather than establishing a minimum</p>	<p>Compliance with the Urban Design Manual is set out in detail in the Architectural Design Statement</p>

<p>window-to-window standard, the aim should be to assess the impact on privacy of each layout and home design based on:</p> <ul style="list-style-type: none"> • The site’s location and residents’ expected levels of privacy • The size of the windows – both those overlooking and overlooked • Changes in level between overlooking windows • Ability to screen/partially obscure views through design <p>In this regard and as benchmark for development, a minimum clearance distance of circa 22 metres, in general, is required between opposing windows, including in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.</p> <p>Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy in line with the provisions of the Urban Design Manual as detailed above.</p> <p>In all instances where the benchmark separation distance is not being met, the applicant shall submit a daylight availability analysis for the proposed development and detail appropriate design measures to reduce undue overlooking.</p>	
<ul style="list-style-type: none"> → A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. → In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. → In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development. 	
<p>Access Cores and Communal Areas</p>	
<ul style="list-style-type: none"> → Apartment schemes should seek to minimise the use of shared entrances, where possible, in favour of own door access at street level. 	<p>Own access units are provided where possible at street level. own door units are also provided along the south of the scheme on the</p>

<ul style="list-style-type: none"> → Where shared access lobbies are proposed the number of units served by one entrance should be kept to a minimum. → Projecting external staircases to access upper floors should be avoided as they can dominate the streetscape. 	<p>new public open space area, providing passive surveillance and activity.</p>
<p>13.5.5 Build-to-Rent / Shared Living Accommodation</p>	
<p>Build-to-Rent (BTR) accommodation consists of purpose-built, long-term rental apartment accommodation that incorporates dedicated residential amenities and facilities.</p> <p>All proposed BTR accommodation must comply with SPPR 7 and SPPR 8 as set out under the of the Apartment Guidelines.</p> <p>Shared accommodation consists of purpose-built and managed accommodation where individual rooms are rented within an overall development that includes access to shared or communal facilities and amenities.</p> <p>In line with the SPPR 9 of the Apartment Guidelines, there shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified under the Housing Need and Demand Assessment.</p>	<p>The development complies with SPPR7 and 8 for the BTR element of the scheme as set out in the application documentation.</p>
<p>Children’s Play Areas</p>	
<p>The Council will require children’s play areas to be provided as an integral part of the design of new residential and mixed-use developments, to be addressed as part of a landscape plan. Student accommodation, housing for older persons and one bedroom units are excluded from the requirements in relation to children’s play. The minimum requirements for provision of play facilities are as follows:</p> <ul style="list-style-type: none"> → All public and semi-private open space (regardless of the type of development it serves) will be required to incorporate play spaces. → Residential developments of 30 units or over shall include provision for children’s play in semi-private or public open spaces, at the discretion of the Planning Authority, through provision of a Young Children’s Area for Play (YCAP), or a Local Equipped Area for Play 	<p>Children’s play areas are provided as set out in the Cameo & Partners Landscape Design Report</p>

<p>(LEAP) or a natural play area. Where publicly accessible these will be taken-in-charge by the local authority. Where developments are predominantly 3 beds or greater, provision will be required for 10 units or over.</p> <ul style="list-style-type: none"> → New play spaces should generally be based on the principles of natural play. → More formal equipped play areas may be appropriate in urban contexts or in the case of larger play facilities. → Play spaces should be carefully sited within residential and built-up areas generally so that they are both easily accessible and overlooked by dwellings, while not causing a nuisance to nearby residents. → Play spaces should be designed to enhance the visual appearance of an area. → Robust natural materials that are less susceptible to vandalism should be used wherever possible. → Play spaces should cater for a wide range of age groups and abilities and be universally accessible. → Suitable provision for teenagers should be considered in the context of the Council's Teenspace Programme (2021), (or any superseding document). 	
<p>13.6 Community Infrastructure</p> <p><i>This Section should be read in conjunction with Chapter 8, Community Infrastructure and Public Open Space.</i></p>	
<p>13.6.1 Early Childhood Care and Education Facilities</p>	
<p>Applications for childcare facilities should be assessed with regard to the requirements of the 'Childcare Facilities: Guidelines for Planning Authorities', DEHLG (2001) and Circular Letter PL 3/2016 (DECLG), 2016) and any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units</p>	<p>The overall proposed development provides for 334no. residential units. However, we can discount the number of 1 bedroom units when calculating the childcare provision. As such, the childcare spaces required is therefore calculated as [(334-193) / 75 x 20 = 37.6 spaces].</p>

<p>for new residential developments, with any variation to this standard being justified having regard to factors such as:</p> <ul style="list-style-type: none"> → Type of residential units (e.g. if mainly one-bedroom units, childcare need may be reduced); → Emerging demographic profile; and → Availability of existing childcare services in the vicinity. <p>In new developments, childcare facilities should be purpose built, at ground floor level or in a stand-alone building. In residential areas the conversion of detached and semi-detached dwellings will be considered at appropriate locations, subject to the protection of residential amenity. The applicant will also be required to demonstrate a spatial rationale for the conversion of a full dwelling in the context of the availability of alternative sites within the catchment, the location of schools and employment, available public transport and existing childcare facilities. In instances of partial conversion from residential to childcare, the proposal will be assessed as a HomeBased Economic Activity.</p>	<p>Considering the proposed development’s characteristics, namely unit mix; the demographic profile of the area; and, the permitted provision of childcare facilities; and the scale of development existing, permitted for the area, we submit that the proposed childcare facilities are sufficient to meet the demand of the future population created by the proposed development.</p>
<p>Planning applications for childcare and early educational facilities should include full details in order to allow understanding of the nature and extent of the proposed development. Planning applications will be assessed on the basis of the following factors:</p> <ul style="list-style-type: none"> • Nature of the facility (full day care, sessional, after school, etc.); • Number of children to be catered for; • Number of full-time and part-time staff; • Intended hours of operation; • Impact on residential amenity, taking into account factors such as noise, traffic and parking; 	<p>Details below subject to operator and legislative requirements</p> <ul style="list-style-type: none"> • Full day care • No. of spaces Up to 44 • Staff as required • 07.00-19.00 operating hours • The facility would primarily serve residents of the scheme and is located on the southern boundary. It is not anticipated that the proposal would attract additional car trips • Set down areas are located to the north of the site in addition to pedestrian access from public transport • Indoor and outdoor play space is provided

<ul style="list-style-type: none">• Suitability of the site for the type and size of facility proposed;• Availability of indoor and outdoor play space;• Accessibility to public transport, walking and cycling routes;• Local traffic conditions;• Access, car parking and drop off facilities for staff and customers.	
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Table 13.24: Minimum Bicycle Parking/Storage Rates

Category	Land-Use	Long Term	Short Stay
Accommodation	Hotel ¹	1 per 5 staff	1 per 10 bedrooms
	Nursing Home	1 per 5 staff	1 per 10 residents
	Residential Apartment	1 per bedroom	1 per two apartments
	Student Accommodation	1 per bedroom	1 per 5 bedrooms
Civic, Community and Religious	Bank Community Centre Library Public Institution	1 per 5 staff	1 per 100 sqm Gross Floor Area (GFA)
	Place of Worship	-	1 per 10 seats
Education	College of Higher Education	1 per 5 staff 1 per 2 students	-
	Crèche	1 per 5 staff	1 per 10 children
	Primary Schools	1 per 5 staff 1 per 5 students	-
	Post Primary Schools	1 per 5 staff 1 per 5 students	-
Medical	Clinics and Group Practices	1 per 5 staff	0.5 per consulting room
	Hospital	1 per 5 staff	1 per 10 beds
Retail and Retail Service	Café Restaurant	1 per 5 staff	1 per 10 seats
	Bar Club ²	1 per 5 staff	1 per 150 sqm GFA
	Retail Convenience	1 per 5 staff	1 per 50 sqm GFA
	Retail Comparison	1 per 5 staff	1 per 50 sqm GFA
	Retail Warehousing	1 per 5 staff	1 per 100 sqm GFA
	Vehicle Service Station	1 per 5 staff	-

The development complies with the minimum cycle parking standards as set out in the Transport Assessment undertaken by Cronin Sutton.

Enterprise and Employment	Offices ³ Manufacturing	1 per 200 sqm GFA	1 per 200 sqm GFA		
	Warehousing	1 per 200 sqm	-		
	Clubhouse Gymnasium ⁴	1 per 5 staff	1 per 50 sqm GFA		
	Courts Pitches	1 per 5 staff	4 per pitch or court		
	Golf or Pitch and Putt Courses	1 per 5 staff	-		
Venue	Auditoriums Cinema Conference Centre Stadium Theatre	1 per 5 staff	1 per 10 seats		
<p>1 - Includes Motel, Motor Inn, Guest House, Bed and Breakfast. Does not include any Bars or Function rooms therein.</p> <p>2 - Includes Dance Halls, Discotheques, Function room, Lounge, Private Dance Clubs and Night Club. Includes such uses when part of a hotel.</p> <p>3 - Includes Office Based Industry, Science and Technology Based Enterprise, Business Park.</p> <p>4 - Includes Recreation Centres.</p>					
Bicycle Parking Design/Provision					
<p>All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011).</p> <p>Bicycle parking/storage associated with residential apartments shall comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) (the 'Apartment Guidelines') in relation to design and provision of facilities, including the following:</p>				<p>The bicycle parking provision and facilities are in accordance with the Apartment Guidelines and National Cycle Manual</p>	

- **Location:** Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road
- **Quantity:** A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc..
- **Design:** Cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Refer to the Apartment Guidelines for further details on design requirements.
- **Management:** An acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking. Refer to the Apartment Guidelines for further details on management.

Proposed change in Material Alterations: Bicycle parking/storage associated with residential apartments shall comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) (the 'Apartment Guidelines'), **as may be amended or updated** in relation to design and provision of facilities, including the following:

The Apartments Guidelines also advise that:

- Planning authorities should ensure that development proposals incorporate details on the provision of and access to cycle storage facilities at planning application stage by the development proposer; and
- Appropriate conditions in relation to the operation and maintenance of the cycle storage facilities should be attached to any grant of permission for apartment developments.

<p>The Council will also seek to provide additional opportunities for the provision of bicycle parking facilities along public transport routes and within town and village centres, parks, and other areas of civic importance.</p> <p>To promote and facilitate cycling, all new commercial developments that have the capacity to accommodate in excess of ten employees or ten students (or a combination of both) shall be required to provide shower and changing facilities.</p>	
<p>13.8.2 Car Parking Standards</p>	

<p>Tables 13.25 and 13.26 set out the Maximum Parking rates for non-residential and residential development. Parking rates are divided into two main categories:</p> <ul style="list-style-type: none">→ Zone 1: General rate applicable throughout the County.→ Zone 2 (Non Residential): More restrictive rates for application within town and village centres, within 800 metres of a train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction). <p>Proposed change in Material Alterations: Zone 2 (Non Residential): More restrictive rates for application within town village centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary within 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction).</p> <p>The provision of parking spaces for car sharing/pooling will be encouraged and will not impact on the maximum rates in Table 13.25</p> <ul style="list-style-type: none">→ Zone 2 (Residential): More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport service⁵ (includes a train station, Luas station or bus stop with a high quality service). <p>Proposed change in Material Alterations: Zone 2 (Residential): More restrictive rates for application within town and villages centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary within 400- 500 metres of a high quality</p>	<p>The development does not exceed the maximum standards as set out in the Transport Assessment undertaken by Cronin Sutton.</p>
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public transport service (includes a train station, Luas station or bus stop with a high quality

Table 13.25: Maximum Parking Rates (Non-Residential)

Category	Land-Use	Zone 1	Zone 2
Accommodation	Hotel ⁷	1 per bedroom	0.5 per bedroom
	Mobile Home Park ⁸	1 per unit	1 per unit
	Nursing Home Retirement Home	1 per 4 residents	1 per 8 residents
	Student Accommodation	1 per 10 bed spaces	1 per 20 bed spaces
Civic, Community and Religious	Bank Community Centre Library Public Institution	1 per 25 sqm GFA	1 per 50 sqm Gross Floor Area (GFA)
	Place of Worship	1 per 6 seats	1 per 12 seats
	Funeral Home	1 per 20 sqm GFA	1 per 20 sqm GFA
Education	College of Higher Education	1 per staff plus 1 per 15 students	1 per 2 staff plus 1 per 30 students
	Crèche School ⁹	1 per classroom	0.5 per classroom
Medical	Clinics and Group Practices	2 per consulting room	1.5 per consulting room
	Hospital	1 per 100 sqm GFA	1 per 150 sqm GFA
Retail and Retail Service	Café Restaurant	1 per 15 sqm GFA	1 per 20 sqm GFA
	Bar Club ¹⁰	1 per 30 sqm	1 per 40 sqm
	Retail Convenience	1 per 15 sqm	1 per 25 sqm
	Retail Comparison	1 per 25 sqm	1 per 35 sqm
	Retail Warehousing	1 per 50 sqm	1 per 50 sqm
	Vehicle Service Station	1 per 250 sqm GFA	1 per 250 sqm GFA
Enterprise and Employment	Offices ¹¹ Manufacturing	1 per 50 sqm GFA	1 per 75 sqm GFA
	Warehousing	1 per 100 sqm GFA	1 per 200 sqm GFA

service).

Sports and Recreation¹²	Bowling Alley	3 per lane	1 per lane
	Archery Ranges Driving Ranges	1 per 3m of base line	1 per 3m of base line
	Clubhouse Gymnasium ⁴	1 per 20 sqm GFA	1 per 40 sqm GFA
	Courts Pitches	15 per pitch or court	7.5 per pitch or court
	Golf or Pitch and Putt Courses	2 spaces per hole	2 spaces per hole
Venue	Auditoriums Cinema Conference Centre Stadium Theatre	1 per 5 seats	1 per 10 seats
	Stadium	1 per 15 seats plus 1 coach space per 500 spectators	1 per 15 seats
Other	Marina (Canal)	1 space per berth (excluding visitor berths)	1 space per berth (excluding visitor berths)
<p>5 - A high frequency route is where buses operate with a minimum 10 minute frequency at peak times and a 20 minute off-peak frequency.</p> <p>6 - Does not include dwellings.</p> <p>7 - Includes Motel, Motor Inn, Guest House, Bed and Breakfast. Does not include any Bars or Function rooms therein.</p> <p>8 - Includes Caravan Park, Holiday Park, Residential Mobile Home Park.</p> <p>9 - Includes Montessori, Primary School, Post Primary School.</p> <p>10 - Includes Dance Halls, Discotheques, Function room, Lounge, Private Dance Clubs and Night Club. Includes such uses when part of a hotel.</p> <p>11 - Includes Office Based Industry, Science and Technology Based Enterprise, Business Park.</p> <p>12 - Council will also seek to provide car parking and/or lay-by for cyclists, hillwalkers and mountain climbers at access points to walking/cycling trails in scenic areas.</p> <p>13 - Includes Recreations Centres.</p> <p>14 - Bus parking should be provided as a minimum rate of one space per course. Where additional bus spaces are provided the maximum number of car spaces per course should be subsequently reduced (amount to be determined).</p> <p>Note: Table 11.23 includes provisions for the loading and unloading of goods and disabled parking (as required by Part M of the Building Regulations, 2010 (as amended) and parking for electric vehicles.</p>			

For any commercial use not specified within Table 13.25 the default parking rate will be calculated based on those of a comparable use and/or determined as part of a Transport and Traffic Assessment.

Table 13.26: Maximum Parking Rates (Residential Development)

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

The number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable subject to:

- The proximity of the site to public transport and the quality of the transport service it provides. (This should be clearly outlined in a Design Statement submitted with a planning application),
- The proximity of the development to services that fulfil occasional and day to day needs,
- The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development,
- The ability of people to fulfil multiple needs in a single journey,
- The levels of car dependency generated by particular uses within the development,

<ul style="list-style-type: none"> → The ability of residents to live in close proximity to the workplace, → Peak hours of demand and the ability to share spaces between different uses, → Uses for which parking rates can be accumulated, and → The ability of the surrounding road network to cater for an increase in traffic. → These criteria should be addressed as part of any Traffic and Transport Assessment and/or Workforce Plan in order to provide full justification for the number of spaces proposed. → The maximum parking standards may also be varied in particular areas by the Planning Authority through planning mechanisms such as SDZ Planning Schemes, → Local Area Plans or Movement Framework Plans and Area Access Studies. 	
<p>13.8.3 Car Parking/Charging for Electric Vehicles (EVs)</p> <ul style="list-style-type: none"> → EV charging shall be provided in all residential, mixed use and commercial development and shall comprise 15% - 20% of the total parking spaces provided, with higher provision within this range required in urban areas. → The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required. → In residential and mixed-use schemes EV charging should be provided in blocks or pods unless it can be satisfactorily demonstrated that it can be provided in a more satisfactory and efficient manner. → It should be designed and located in such a way as to ensure passive surveillance and avoid anti-social behaviour. → The applicant should indicate the mechanism for EV charging and payment (e.g. fob/credit card or other means) and should ensure that it is available to residents and visitors. 	<p>20% of car parking spaces will be provided with charging and the remainder will be ducted for future infrastructure.</p> <p>The car parking is internal to the scheme and therefore will not facilitate anti social behaviour and will be a managed space.</p>

<ul style="list-style-type: none"> → EV charging facilities should not impinge on shared parking allocation. → EV charging facilities should not obstruct or impinge on walking or cycling paths. → Charge points should avoid areas which are already restricted by existing street furniture e.g. bollards, road signs, benches, bike racks. → Charge points should not impede lower carbon forms of passenger transport. → Charge points should not be located at the back of the footpath (i.e. side furthest from the road) to avoid cables becoming a trip hazard. → For residential multi-unit buildings, the necessary ducting for all car parking spaces should be installed, allowing provision for additional electrical infrastructure. → For new dwellings with in-curtilage parking, appropriate infrastructure should be provided to allow for installation of a charging point at a later date. <p>Proposed Change as part of Material Amendments (bullet point 1): EV charging shall be provided in all new residential, mixed use and commercial development and shall comprise 15%-20% a minimum of 20% of the total parking spaces provided (or as may be further required by legislation), with higher provision within this range required in urban areas, with the remainder of spaces to be future proofed.</p> <p>Proposed Change as part of Material Amendments (bullet point 2): The remainder of the parking spaces should be constructed to be capable of accommodating future charging points., as required.</p>	
<p>Parking in Town, District and Shopping Centres and Large Commercial/Residential Development</p> <ul style="list-style-type: none"> → Parking arrangements for specific user requirements including disabled drivers, motorcycles and scooters will be required in town and district centres, shopping centres, public transport nodes and other destinations. 	<p>Parking is provided under the podium and at a basement level.</p> <p>6 no. accessible spaces are provided.</p>

<ul style="list-style-type: none"> → Payment systems will be required for car parks associated with major shopping centres and other large commercial developments where new facilities or major extensions to existing facilities are proposed. → For residential densities of 40-50 dwellings per hectare and within town and village centres, a combination of on-street parking and supplementary off-street parking will be required. → For large commercial developments or residential developments of over 50 dwellings per hectare, large areas of off-street parking will be required as follows: <p>Parking Courts: To ensure surface parking does not dominate the urban landscape, parking courts that are highly visible from the public domain, should be restricted in size (with no more than 40 spaces per court) and should be well landscaped. Where larger areas of surface parking are proposed they should be located behind buildings, and/or in the centre of blocks, so that they are obscured from view.</p> <p>Basements: To ensure a safe and secure environment, basement car parks should be well lit and well ventilated. Basement car parks that protrude above the ground level as a street interface will generally not be acceptable in town and village centres due to their visually obtrusive and inactive nature. A protrusion of up to 1.2m may be acceptable in residential areas provided the facade is screened with planting and it does not inhibit levels of passive surveillance from residences or the formation of ‘own door’ access from the street.</p> <p>Multi-Storey Car Parks: To ensure that an attractive interface is created large areas of blank facade should be avoided. In town and village centres car park structures should be wrapped with or placed over retail and commercial units. Upper storeys should be suitably treated to ensure they make a positive contribution to the public domain.</p>	
<p>(II) Design and Siting of Refuse Storage, Recycling and Bring Facilities in Developments</p> <p>The following criteria will be considered in the assessment of the design and siting of waste facilities and bring facilities:</p> <ul style="list-style-type: none"> → The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and 	<p>Compliance with the Apartment Guidelines with respect to operational waste is set out in the Operational Waste Management Plan prepared by AWN.</p>

<p>vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants.</p> <p>→ Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the guidelines Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, DHLGH (2020). Refuse storage for houses should be externally located, concealed / covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses, the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity.</p>	
<p>(IV) Construction and Demolition Waste</p> <p>Construction and Demolition Waste Management Plans should be submitted as part of development proposals for projects in excess of any of the following thresholds: New residential development of 10 units or more;</p> <ul style="list-style-type: none"> → New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,000 square metres; → Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume, of Construction and Demolition (C&D) waste; → Civil engineering projects in excess of 500 cubic metres of waste materials used for development works on the site. <p>The Construction and Demolition Waste Management Plan, as a minimum, should include provision for the management of all construction and demolition waste arising on site, and make provision for the reuse of said material and/or the recovery or disposal of this waste to authorised facilities by authorised collectors. Where appropriate, excavated material from development sites is to be reused on the subject site.</p>	<p>A Construction and Demolition Waste Management Plan is submitted with the application.</p>

3.0 CONCLUSIONS

It is submitted that the development is generally consistent with the provisions of the draft Development Plan. Where a material contravention has been identified, this is justified in the material contravention statement under separate cover. At the time of submission, the proposed material alterations to the draft Development Plan have been published; however, the final content of the 2022-2028 Development Plan is not known on submission.